



DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND PRINTING
FORT WORTH, TEXAS 76131

February 22, 1999

Rosemary Rabbani
Claims Examiner
U.S. Department of Labor
Employment Standards Administration
Office of Worker's Compensation Program
Dallas, TX 75202

Subject: Cynthia Chavers, file #160324463

Dear Ms. Rabbani:

This letter is to provide additional information referenced in your letter of January 21, 1999 regarding a claim filed by Cynthia Chavers, file number 160324463.

The following will address the six questions mentioned in your letter in the order asked:

Question #1: Provide comments from a knowledgeable supervisor on the accuracy of all statements provided by the employee relative to this claim. Does the agency concur with the employee's allegations? If there are points of disagreement, please explain fully and provide any appropriate supportive evidence.

Answer #1: We are not disputing Ms. Chaver's accounts that she became ill in relation to the incidents mentioned in the claim, however we do not concur with the allegations and conclusions made by Ms. Chavers. At no time were we aware of any substances present in her work environment that were above the OSHA permissible exposure limits. In addition, in all three cases, the safety precautions listed on the MSDS's for chemicals being used were being followed.

Ms. Chaver's letter separates the claim into three exposures:

Exposure 1: Ms. Chavers claimed that smells from the ink mill on 10/24/99 between 0700 and 0900 made her ill. The proposed smell was investigated on 10/24/99 at 0835 by safety personnel and no odor was detected (see attached incident report). In addition, air quality monitoring has been done on several occasions within the ink mill area with no chemicals measuring above or even close to the OSHA permissible exposure limits (PELs) (see attached air quality monitoring data).

Exposure 2: On 11/4/98, Ms. Chavers claimed that fumes from mineral spirits in a drum on the other side of the wall of her office made her ill and could be "toxic". Although there was a satellite waste accumulation drum in this location that was used to collect spent mineral spirits, the drum did not contain any "toxic" solvents which by definition implies halogenated solvents. Also, there is adequate ventilation in the area, which is the primary precaution noted in the MSDS (attached). As a result of a previous claim by Ms. Chavers, the satellite waste accumulation drum was at one time, relocated to another area. During an EPA multimedia inspection on June 9, 1998, the BEP was required to return the accumulation drum to the original area. Satellite accumulation drums are required by the Resource Conservation Recovery Act to be located directly in the area where the work is in progress.

Exposure 3: On 11/30/98, Ms. Chavers claimed that while working in the receiving office, fumes from tar being used for roof repair made her sick. The tarring of the roof was a temporary situation. During this time, significant precautions were taken to minimize fumes from the roofing process. A fume collection system was installed on the roofing tar kettle. Also, the intakes from the roof area into the building were both mechanically shut and physically covered up. Ms. Chavers claims holes in the roof allowed tar fumes to enter the building, however this is not probable since the holes were created during demolition of the old roof and the tar application did not begin until after the new insulation and roofing felts were installed.

Question #2: To what potentially harmful substances has the employee been exposed? Include any fumes, dust, chemicals, etc. Provide the results of any air samples. What levels of concentration are considered safe? Provide a copy of the safety data sheet provided by the supplier if applicable.

Answer #2: It should be noted that no potentially hazardous chemicals are used or stored in Ms. Chavers actual work area (her office). Also, the term "exposed" is defined as contact with hazardous chemicals above OSHA PELs. As mentioned before we are not aware of any chemicals that were above OSHA PELs that she came in contact with. That being said, the following is a list of chemicals used in relation to the three reported exposures:

*Air Quality Samples Taken within Ms. Chaver's office and surrounding areas (see attached report).

| <u>Substance</u> | <u>Highest Level Monitored</u> | <u>OSHA PEL</u> |
|------------------|--------------------------------|-----------------|
| Printing Ink | .12ppm | 300ppm |
| Varsol | .01ppm | 350ppm |
| Butyl Cellosolve | .015ppm | 50ppm |

*Air Quality Samples were taken on the following chemicals within the ink mill area. No chemicals were found above OSHA PEL's (see attached reports): Benzene, toluene, xylene, toluene, ethyl benzene, naptha, carbon black.

Air quality samples are not available for the coal tar or mineral spirits. MSDS are included for all applicable substances.

Question #3: If air samples are not available, please explain in detail the air circulation/ventilation of the claimant's work area (i.e. size of room, fans, overhead air ducts, windows, etc. and where located in relation to the claimant's work area).

Answer #3: The room is 10ft by 21ft with a ceiling of 8ft. This equates to 1680 cubic feet of air space. There are no windows to the outside and there is only one door. Air conditioning is supplied by a direct expansion cooling unit that sits on the decking above the office. This cooling unit supplies 780 cubic feet per minute (cfm) of air into the room, resulting in 27.8 air changes per hour. The supply air is drawn completely from the Contractor Dock Area with no return air directly from the room. There are two diffusers in the room, one near each occupant, supplying 390 cfm each. The room air is then pushed above the ceiling tiles, through a grill, by the supply air and is subsequently discharged back into the dock area through an opening in the decking.

Question #4: What tasks did the employee perform which resulted in the exposure or contact? What was the frequency and duration of exposure?

Answer #4: Ms. Chavers was not performing any tasks that would have resulted in exposures to hazardous chemicals during the times of her claims. Paragraph K of her job description requires her to work in an environment where she could be exposed to conditions of irritating or dangerous chemicals.

Question #5: What precautions were taken to minimize effects of exposure (e.g. mask or respirator)?

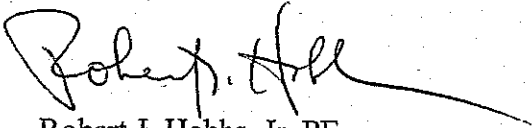
Answer #5: As previously mentioned, MSDS safety recommendations were followed, and prudent efforts to minimize tar fumes were made.

Question #6: Provide a copy of this employee's position description and physical requirements of the job. Explain how the actual duties varied from the official description.

Answer #6: A copy of Ms. Chaver's position description is included with this letter. Her actual duties did not vary from the official description.

Although we do not believe that Ms. Chavers was exposed to any harmful chemicals above the Permissible Exposure Limits, we are willing to accommodate her by relocating her job. The area we propose would be in Technical Support Administration located some distance away from the loading, receiving and maintenance area. The air quality in the proposed administration area has been monitored and she is much less likely to come in contact with chemicals that may be an irritant for her.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Hobbs, Jr.", with a long, sweeping horizontal line extending to the right.

Robert J. Hobbs, Jr. PE
Manager, Facilities Management Branch
And Safety Health, Environmental Section

Attachments

cc: D. Leon Griffin
Elvie Lacy
Bennie Thomas
Dennis Stark
Fayvet Wesley
Cynthia Chavers

Training Records

All Safety Specialists and Stationary Engineers are on the First Responder Team as discussed in the Chemical Emergency Response manual. All have the 40-hour Hazwoper Training and receive an 8-hour refresher course each year. The First Response Team's mission is to isolate and contain major spills. Major clean ups are contracted to an outside company that specializes in hazardous waste cleanup. See attached training records.

In the event of a chemical emergency the Police force has been instructed to establish a perimeter as directed by the First Response Team. Police representatives are trained if space is available in the class.

June 7, 1999

To: Colleen McKinney
From: Thurman Garrison
Subject: Hazwoper Refresher Training - Eight Hours

Annual eight-hour Hazwoper Refresher Training was conducted on July 22, 1998 and on August 3, 1998, by the Safety Office. The below listed are the only certificated personnel that attended the training:

| NAME | TITLE | DEPARTMENT | COMPLETION DATE |
|---------------------|----------------------|---------------|-----------------|
| Barnes, Gary | Stationary Engineer | Power Plant | 8-3-98 |
| Cavazos, Fred | Stationary Engineer | Power Plant | 7-22-98 |
| Creed, Debbi | Industrial Hygenist | Safety | 7-22-98 |
| Garrison, Thurman | Safety Specialist | Safety | 7-22-98 |
| Hill, Rick | Environmental Tech. | Environmental | 7-22-98 |
| Leatherwood, Howard | Stationary Engineer | Power Plant | 7-22-98 |
| Martinez, Lucio | Safety Specialist | Safety | 7-22-98 |
| McIntire, Don | Stationary Engineer | Power Plant | 7-22-98 |
| Powell, Glenn | Stationary Engineer | Power Plant | 8-3-98 |
| Regula, John | Industrial Hygienist | Safety | 7-22-98 |
| Swift, Gary | Safety Specialist | Safety | 7-22-98 |
| Tijerina, Roberto | Lieutenant | Police | 7-22-98 |

Hazwoper Refresher Training should be conducted in July & August of 1999 to keep everyone current. Safety usually conducts the course with Rick Hill's assistance. I am in the initial phase of setting up the course for 1999.

Cc: Robert Hobbs
Karl Bennett
Colleen Thompson

8 HOUR HAZWOPER REFRESHER

DATE: Wednesday, JULY 15 & 22, 1998

TIME: 8AM UNTIL 4PM

LOCATION: TRAINING ROOM T219

| SECTION | INSTRUCTOR | TIME |
|--|--------------------------|----------------|
| INTRODUCTION <ul style="list-style-type: none">•COURSE CONTENT•WHAT IS HAZWOPER(HISTORY, LAW, PURPOSE, TRAINING REQUIREMENTS). | THURMAN GARRISON | 15MIN. |
| BEP HAZWOPER PROGRAM <ul style="list-style-type: none">•NAMES OF STAFF & ALTERNATES RESPONSIBLE FOR SAFETY & HEALTH•DEFINE LARGE SPILL VS. SMALL SPILL•SEQUENCE OF EVENTS IN CASE OF SPILL•CONTACTS(PHONE # AND INDIVIDUALS) DURING SPILL EPISODE | DEBBI CREED | 11/2HR. |
| BREAK <ul style="list-style-type: none">•DISCUSS WRITTEN BEP HAZWOPER PROGRAM & EMERGENCY PLAN•DISCUSS SPILL EVENTS THAT HAVE OCCURRED AT THE BEP, THE ACTUAL RESPONSE SCENE AND THE APPROPRIATE RESPONSE SCENARIO IF DIFFERENT FROM WHAT OCCURRED•EMPLOYEE'S ROLE IN THE RESPONSE PLAN INCLUDING SITE SECURITY AND CONTROL | | 15MIN. |
| BREAK | | 15MIN. |
| MEDICAL SURVEILLANCE REQUIREMENTS <ul style="list-style-type: none">•INCLUDING RECOGNITION OF SYMPTOMS & SIGNS THAT MIGHT INDICATE OVEREXPOSURE TO HAZARDS | HEALTH UNIT NURSE | 1/2HR. |
| HAZARD RECOGNITION <ul style="list-style-type: none">•CLASSIFICATION, DETECTION, SURVEY THE SCENE•BASIC HAZARDOUS MATERIAL TERMS•HOW TO USE THE MSDS DURING A SPILL•WORK PRACTICES BY WHICH EMPLOYEES CAN MINIMIZE RISK FROM HAZARDS | JOHN REGULA | 1HR. |
| LUNCH BREAK | | 1/2HR. |
| DOT RESPONSE GUIDEBOOK | THURMAN GARRISON | 1/2HR. |
| PERSONAL PROTECTIVE EQUIPMENT | DEBBI CREED | 3/4HR. |
| BREAK | | 15MIN. |
| BEP RESPONSE EXERCISE <ul style="list-style-type: none">•DONNING, DOFFING, DECON•LOCATION & DESCRIPTION OF HAZARDOUS WASTE AT BEP•SPILL CARTS (CONTENTS & LOCATION)•SAFE USE OF ENGINEERING CONTROLS & EQUIPMENT ON SITE•SPILL SIMULATION EXERCISE | RICK HILL | 2HRS. |

****CERTIFICATES WILL BE ISSUED APPROXIMATELY 2 WEEKS AFTER COMPLETION OF TRAINING.**

United States Public Health Service

Federal Occupational Health

Certifies
That

Gary Barnes

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

August 3, 1998


Enrique Delgado, C.F.H.

United States Public Health Service

Federal Occupational Health

Certifies
That

Fred G. Cabazos

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

[Signature]
Enrique Delgado, CHH

Health and Safety Resources

Certifies
That

Debbi Creed

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debbi Creed, CMH
Debbi Creed, CMH

Health and Safety Resources

Certifies
That

Thurman J. Garrison

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debi Creed, civ
Debi Creed, CHS

Health and Safety Resources

Certifies
That

Rick Hill

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debbi Creed, CPH
Debbi Creed, CPH


United States Public Health Service

Certifies
That

Howard Leatherwood

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998


Enrique Delgado, CPH

Health and Safety Resources

Certifies
That

Lucio Martinez

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debbi Creed, CSM
Debbi Creed, CSM

United States Public Health Service

Certifies
That

Don McIntire

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998


Enrique Delgado, CHS

United States Public Health Service

Federal Occupational Health

Certifies

That

Glen Powell

Has Successfully Completed
Hazardous Waste Operations & Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

August 3, 1998

by Enrique Delgado, CPH

Health and Safety Resources

Certifies
That

John Regula

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debbi Creed, CM
Debbi Creed, CM

Health and Safety Resources

Certifies
That

Gary Swift

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998

Debbi Creed, CSR
Debbi Creed, CSR


United States Public Health Service

Certifies
That

Roberto Tixerina

Has Successfully Completed
Hazardous Waste Operations 8 Hour Annual
Refresher Training Requirements
as per 29 CFR 1910.120

July 22, 1998


Enrique Delgado, CPH

CHEMICAL EMERGENCY RESPONSE PLAN

EMERGENCY CONTACTS AND FACILITY DESCRIPTION

| | |
|--|--|
| Emergency Contact: Colleen McKinney | Work Phone: (817) 847-3820 |
| Title: Chemical Engineer | Emergency Phone: (800) 405-5831 |
| Chemical Emergency Coordinator | |

| | |
|--|--|
| Emergency Contact: Karl Bennett | Work Phone: (817) 847-3945 |
| Title: Senior Safety Specialist | Emergency Phone: (800) 314-7649 |
| Acting Chemical Emergency Coordinator | |

Facility Type: Currency Production

Operating Schedule: 24 hours per day, Monday – Friday

Average Daily Discharge of Waste Water: 150,000 GPD

BACKGROUND

Several governmental regulations require industry to prepare written plans which describe the management of chemicals and hazardous waste and the response in the event of a spill. These regulations are contained in federal, state and local laws. City of Fort Worth ordinance requires an Accidental Discharge Plan for preventing slug loads of pollutants into the sanitary sewers. This requirement is derived from EPA rules for the pretreatment of industrial waste (reference: 40 CFR 403.8 (f)(2)(v)).

The EPA hazardous waste regulations, RCRA, require generators to prepare a Contingency Plan to minimize the effects of accidental releases of hazardous waste to the environment (reference: 40 CFR 262.34 (4) and 265.52). This requirement is repeated in state rules.

In addition, OSHA requires industry to prepare an Emergency Response Plan which addresses employee safety and cleanup response in the event of a hazardous chemical spill (reference: 29 CFR 1900.38 (a) and 1910.120 (q)).

Since each of the required plans have common elements, the Western Currency Facility of the Bureau of Engraving and Printing has developed this comprehensive plan to satisfy them.

SCOPE AND PURPOSE

This plan describes the facility and the procedures to protect employees and the environment from harm in the event of a chemical or hazardous waste spill. This plan complies with the regulatory requirements of OSHA, EPA and the City of Fort Worth for emergency planning.

INDUSTRIAL PROCESSES AND CHEMICALS

The primary business of the Western Currency Facility of the Bureau of Engraving and Printing is the (1) printing of paper currency. In addition, (2) nickel plates used to print currency are manufactured, (3) PVC wiping rollers are resurfaced, (4) waste ink is reconstituted for reuse within the facility and virgin ink is manufactured. Each of these manufacturing processes are described below.

1. Currency Production

Using 12 intaglio printing presses, approximately one million sheets of currency are printed per day. This currency is allowed to air dry and is then examined visually for defects. The final printing of the currency is then done in the Currency Overprinting and Packaging (COPE) area. No floor drains are present in any of these production areas.

The intaglio presses are cleaned and waste ink is removed using solvent and a rinsing solution called "Water Wipe". It is composed of 98.5% soft water, 1.0% sodium hydroxide and 0.5% sulfated castor oil. This waste "water wipe" solution is collected in underground double walled sumps (with a leak detection system) and pumped to the waste pretreatment plant in another area of the plant.

Cleaning in the COPE area is primarily done with solvent. In the COPE printing area, a solvent accumulation drum is used to collect excess solvent.

2. Platemaking.

An electrolytic plating process is used to manufacture nickel printing plates for use on the intaglio presses. These plates are hard chromed to add strength. There are two nickel tanks and two chrome tanks in the plate making process. Soft water is used to rinse the plates when they are removed from a plating tank. This rinse water drains into a sump which is pumped over to waste treatment where it is treated in a coagulation/flocculation process to remove the heavy metals. If the contents of the plating tanks are to be replaced, the old chemical is pumped into waste accumulation drums and shipped as hazardous waste. There are no floor drains to the sanitary sewer in this area.

3. Plastirota.

Polyvinyl chloride (PVC) wiper rollers are resurfaced in Rollermaking. There are no floor drains in this area. The PVC powder is mixed with a gel monomer catalyst to make the PVC paste that is applied to the roller surface. Cleaning in the roller making area is primarily done with solvent. A solvent accumulation drum is used to collect excess solvent.

4. Ink Reconstitution and Manufacturing.

Ink reconstitution and manufacturing began at the Western Currency Facility in 1997. Waste ink is collected from the intaglio presses and drummed. This waste product is moved to the ink mill area where it is reconstituted. The reconstituted ink is returned for use on the intaglio presses. One other ink product is currently in production in the ink mill; that is, an intaglio non-magnetic black ink. No floor drains to the sanitary sewer exist in this area. Equipment cleaning in the ink mill is done primarily with solvent. A solvent accumulation drum is used to collect excess solvent.

WASTE PRETREATMENT

The waste water wipe solution described in Number 1 above is pumped to the waste treatment area where it is treated in a coagulation/flocculation process to remove the ink solids. Coagulant is separated by centrifugation. The equalization tank, four treatment tanks and the calcium chloride storage tank are all surrounded by a 3-foot secondary containment wall. There are no drains to the sanitary sewer in this area. There is a drain to a double-walled underground spill containment tank with a leak detection system.

Sulfuric acid is used to neutralize the decant from the centrifuge. Ninety-three percent sulfuric acid is purchased and stored in a 6,000-gallon tank. The 93% sulfuric acid is diluted to 17% which is stored in a 4,000 gallon tank. The sulfuric acid tanks are surrounded by a 3-foot secondary containment wall. There is no drain to the sanitary sewer in this area. Sulfuric acid spills are neutralized in the area using sodium bicarbonate and cleaned up.

Solids removed during the centrifugation of the treated waste rinsing solution are classified as a Class I, industrial non-hazardous waste. These solids are collected in 55-gallon drums.

As discussed in Number 2 above, the rinse water from platemaking is treated in a separate treatment system to remove the metals from the waste stream. It is a coagulation/filtration batch process that uses a filter press to separate the coagulated solids. The water effluent from the system is bench tested for metal content before it is released to the sanitary sewer. The treatment system is surrounded by an 8-inch secondary containment berm. No floor drains to the sanitary sewer are in this area.

WASTE DISPOSAL

All process wastes are placed in compatible containers and properly labeled. All waste containers are staged in Area 12, adjacent to Dock doors 13 and 14 in preparation for shipment. There are no floor drains in this area. Spill cleanup and absorbent materials are available in this area should a spill occur. The Western Currency Facility follows applicable accumulation and disposal requirements and utilizes a reputable, registered waste disposal contractor for shipment and disposal of industrial non-hazardous and hazardous wastes.

HAZARDOUS MATERIALS OVERVIEW

I. HAZARDOUS MATERIALS

Hazardous materials present in the plant in container volumes greater than 55 gallons are summarized below. Hazardous materials in consumer quantity packing is not addressed because the packaging of these materials reduces the possibilities of contamination. However, hazard warnings on these packages should not be ignored or minimized because of their exclusion from this discussion.

- A. Except for fuel oil the hazardous materials in Figure 3.1 are received by Shipping and Receiving personnel at Post 9 and stored in the specified locations. Fuel oil is received in a tank truck and unloaded directly into the fuel oil tanks.
- B. The hazardous materials in Figure 3.2 are received by the Waste Treatment Contractor in tank trucks, off-loaded at the pump house and stored in the tanks provided in Waste Treatment.
- C. Industrial Hazardous Waste. Hazardous waste accumulation drums are listed in Figure 3.3. When an accumulation drum is full, the area supervisor will notify the Environmental Technician. The Environmental Technician will inspect and label the drum and arrange to have it removed to the hazardous waste staging area in preparation for shipment. The Environmental Technician will also arrange for a new accumulation drum that is labeled. The plant's Chemical Engineer is responsible for ensuring that the Western Currency Facility is in compliance with all Federal, State, local and BEP regulations.

II. INVENTORY OF HAZARDOUS MATERIALS

The Safety and Occupational Health Office must maintain a complete inventory of the hazardous materials, by location, in the Western Currency Facility. This inventory provides immediate data on the materials stored and used in the areas, maximum quantity and health, flammability and reactivity hazards relative to the material. The Police Operations Command Center located in the hardened command center will maintain a duplicate copy of the inventory for Fire Department use.

Each work center will maintain a copy of the Material Safety Data Sheets (MSDS) for the material in use in the area.

III. PERSONNEL TRAINING

All personnel will receive Hazard Communication training through the Safety and Occupational Health Office. General Stores personnel who are the primary movers of hazardous materials will receive specialized training by the Plant's Chemical Engineer.

Figure 3.1

Hazardous Material - General

| Material Description | Container Size | Location | Location Description | Hazard |
|--------------------------|-----------------|----------|--------------------------|-------------|
| Mineral Spirits | 55 gal | | Flammable Liquid Storage | Flammable |
| Naptha | 350 gal tote | | Flammable Liquid Storage | Flammable |
| Odorless Mineral Spirits | 55 gal | | Portable Storage Bldg | Flammable |
| Isomet Solvent | 55 gal | | Flammable Liquid Storage | Flammable |
| Fuel Oil - Tank | 10,000 gal tank | Outside | Underground Storage Tank | Combustible |
| Fuel Oil - Tank | 10,000 gal tank | Outside | Underground Storage Tank | Combustible |
| Plastirola Monomer | | P-119 | Warehouse | Reactive |
| Chromic Acid Flakes | | P-175 | Warehouse | Corrosive |
| Chromic Acid | | P-120 | Platemaking | Corrosive |
| Sodium Hydroxide (NaOH) | | P-120 | Platemaking | Corrosive |
| Sodium Hydroxide (NaOH) | 55 gal | P-175 | Warehouse | Corrosive |

Figure 3.2

Hazardous Materials - Waste Treatment (Bulk)

| Material Description | Container Size | Location | Location Description | Hazard |
|---------------------------|-----------------|----------|----------------------|-------------|
| Sodium Hydroxide (NaOH) | 10,000 gal tank | S-138 | Waste Treatment | Corrosive |
| Sulfonated Castor Oil | 6,000 gal tank | S-138 | Waste Treatment | Combustible |
| Water Wipe, T4W | 1,600 gal tank | S-138 | Waste Treatment | Corrosive |
| Water Wipe, T5W | 1,600 gal tank | S-138 | Waste Treatment | Corrosive |
| Sulfuric Acid, 93% - Tank | 6,000 gal tank | S-151 | Waste Treatment | Corrosive |
| Sulfuric Acid, 17% - Tank | 4,000 gal tank | S-151 | Waste Treatment | Corrosive |

Figure 3.3

Hazardous Waste Accumulation Drums

| Waste Description | Container Size | Accumulation Points | Location | Hazard |
|-------------------|----------------|---------------------|----------|-------------|
| Waste Solvent | 55 gal drum | Ink Mill | M109 | Flammable |
| | | COPE | P101 | Flammable |
| | | Plastirota | P119 | Flammable |
| Waste Oils | 55 gal drum | EM Shop | P127 | Combustible |
| Chromic Acid | 55 gal drum | Platemaking | P120 | Corrosive |
| Sodium Hydroxide | 55 gal drum | Platemaking | P120 | Corrosive |
| | | EM Shop | S125 | Corrosive |

SPILL PREVENTION

The Western Currency Facility of the Bureau of Engraving and Printing avoids purchasing excessive volumes of chemicals. Chemical inventories are tracked by computer and are automatically ordered when inventories fall below specified quantities.

The currency production, platemaking, plastirota and ink mill areas have no floor drains to the sanitary sewer, therefore, contamination is impossible from spills. Absorbent material is available within each local production area to respond to spills.

In waste treatment, no floor drains to the sanitary sewer are present. The secondary containment area under the treatment tanks drains to a double-walled, underground spill containment tank with a leak detection system. The room in which the waste water wipe solution of 98.5% soft water, 1.0% sodium hydroxide and 0.5% sulfated castor oil is mixed has no drains to the sanitary sewer. Drains to the double-walled, underground spill containment tank mentioned above are present.

Bulk deliveries of liquid chemicals to waste treatment are received at the pump house just outside the waste treatment area. Absorbent material is available in the pump house to keep spills from the off-loading operation of these tanker trucks from contaminating the storm sewer.

Spills are prevented in handling by proper training and licensing of forklift drivers. Chemicals are purchased in quantities smaller than 55 gallons, which limits the potential for a large spill.

SPILL RESPONSE

The spill or release of chemicals or hazardous waste is considered an emergency situation. The response to such an incident may have these elements:

- I. Awareness and Identification
- II. Evacuation
- III. Notification
- IV. Spill Cleanup

Personnel from the affected work area can execute the elements listed above for all minor spills. A minor spill is one which is contained on-site and does not involve contamination of air, soil, drainage, or groundwater off-site and is a spill which can be cleaned up by employees wearing simple personal protection, i.e., gloves, aprons, boots and face shields.

A major spill is a chemical release which contaminates or has the potential to contaminate air, soil, or water outside the Western Currency Facility property. It must also be a spill which involves dangerous fumes or toxic conditions and requires the use of special protective gear, such as respirators or self-contained breathing apparatus. Any major spill will require a response from outside agencies or specialized contractors.

Each of these elements are discussed in this plan.

I. AWARENESS AND IDENTIFICATION

Employees will initiate the response upon awareness of an emergency situation. A spill can be as easy to identify as the sudden, unplanned release of liquid chemicals from a tank rupture, or the presence of smoke or fumes. A spill may be subtle such as a wet area around the base of a drum. Upon awareness, an employee will follow these procedures:

A. Employee's Responsibility.

1. Warn other workers to stay clear of the spilled material.
2. Immediately report the spill to the supervisor of the area in which the spill has occurred.
3. If there is no supervisor present or if the incident occurs in a public area, the employee will assume the supervisor's responsibilities.

B. Supervisor's Responsibility (IF THE SUPERVISOR IS NOT PRESENT, THE EMPLOYEE ASSUMES THIS RESPONSIBILITY).

1. Will immediately assess the spill and decide if the spill is an emergency situation. Not all spills will be considered an emergency.

A minor spill is contained on-site and does not involve contamination of air, soil, drainage or groundwater off-site, and is a spill which can be cleaned up by employees wearing simple personal protection, i.e., gloves, aprons, boots and face shields.

A major spill is a chemical release which contaminates or has the potential to contaminate air, soil, or water outside the facility property. It must also be a spill which involves dangerous fumes, toxic conditions and requires the use of special protective gear, such as, respirators or self-contained breathing apparatus. Any major spill will require a response from outside agencies or specialized contractors.

2. If an emergency situation exists, the supervisor will;
 - a. Immediately evacuate the area to the designated fire evacuation muster point.
 - b. Notify the Police Operations Command Center.
 - c. The supervisor immediately goes to the muster point to account for all the employees evacuated from the area.

C. Police Operations Command Center

1. Immediately notify the First Response Team by radio/telephone.

2. If directed by the First Response Team, the Police will call 911 for emergency assistance.
3. Secure the perimeter established by the First Response Team.
4. Escort outside emergency response personnel.

D. First Response Team (FRT)

The First Response Team will direct the response. The First Response Team consists of the Power Plant Stationary Engineers assisted by any contract Safety Specialists currently on site. Upon notification from the Command Center, the responsibilities of the First Response Team are:

1. Immediately assess the emergency situation.
2. Establish a perimeter and, if possible, prevent the spill from contaminating other areas. Notify the Police Command Center of location of the perimeter.
3. If outside emergency assistance is needed the First Response Team will radio or telephone the Police Operations Command Center who will call 911.
4. Identify the character, source and amount of any released materials either by observation or review of facility records or manifests.
5. Notify the Chemical Emergency Coordinator of the emergency.

E. Chemical Emergency Coordinator (CEC)

1. Obtain a description of the emergency from the First Response Team.
2. Assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion.
3. If the CEC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment outside the facility, he/she must report the findings as follows:
 - a. Immediately notify the National Response Center using the 24-hour toll free number (800) 424-8802. The report must include:
 - (1) Name and telephone number of reporter;
 - (2) Name and address of facility;
 - (3) Time and type of incident (e.g., release, fire);

- (4) Name and quantity of material involved, to the extent known;
 - (5) The extent of injuries, if any and
 - (6) The possible hazards to human health or the environment outside the facility.
- b. Ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released material and removing or isolating containers.
 - c. If the facility stops operations in response to a fire, explosion or release, the CEC must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

II. EVACUATION

The procedures for evacuation presented in Appendix A will be followed in all emergency situations.

III. NOTIFICATION

The Chemical Emergency Coordinator will notify all environmental agencies as required by local, state and federal regulations.

A. SANITARY SEWER SPILLS:

City of Fort Worth Water Department The City of Fort Worth will be notified immediately by the Chemical Emergency Coordinator of any accidental or slug discharge into the sanitary sewer system. A slug discharge is "any discharge of water, sewage, or industrial waste other than toxic material which in concentration of any given constituent or if quantity or flow exceeds for any period of duration longer than fifteen(15) minutes or more than five times the average twenty-four (24) hour concentration or flow during normal operations." The phone numbers for notification are:

- **Pretreatment Services Division**
920 Fournier Street
Fort Worth, TX 76102-3456

Phone: 817-871-8305
- **Field Operations**
Phone: 817-871-8300

B. SPILLS ONTO SOILS OR DRAINAGE:

State rules require the prompt notification of spills. If there is a spill of chemicals or of industrial waste water of any volume onto the soil or into a drainage that migrates off-site, then the Texas Natural Resources Conservation Commission (TNRCC) must be notified. The notification must be made immediately or no later than twenty-four (24) hours after the spill. The phone contact numbers for the TNRCC local office and the twenty-four (24) hour Emergency Response Center in Austin are:

TNRCC Region 4 Office
1101 East Arkansas Lane
Arlington, TX 76020-6499

**TNRCC – Austin
Pollution Clean Division
Messenger Building D
P.O. Box 13087
Austin, TX 78711**

Phone: 512-463-7727 (24-hour hotline)

If the "reportable quantity" for the spilled material is exceeded, then the EPA (as well as emergency management agencies) must be notified. Hazardous substances and reportable quantities are listed in 40 CFR 302.4. If the off-site spill exceeds these amounts, then immediately call:

**Local Emergency Planning Commission for Tarrant County
1000 Throckmorton Street
Fort Worth, TX 76102-4733
817-871-6088 (working hours)**

**National Response Center, U.S. Coast Guard
800-424-8802**

Within five (5) days of a reportable accident release, a written report must be submitted to the appropriate agency for review to prevent recurrence. The report will explain the causes of the spill and corrective actions to prevent further problems.

IV. SPILL CONTAINMENT AND CLEANUP

Spills of hazardous material in all areas without floor drains to underground emergency spill containment tanks will be contained and cleaned up with absorbents. Absorbents are available in all production areas. Large spills are unlikely because chemicals are maintained in their original factory containers or smaller compatible containers.

In the waste treatment area, an underground spill containment tank located just outside the south door of the plant can receive spilled material from the secondary containment area around the treatment tanks and from the water wipe makeup area. The contents of the spill containment tank can be pumped back into the equalization tank for treatment.

- A. Waste rinsing solution: If a spill occurs in the secondary containment area under the treatment tanks in waste treatment, the spill will drain to an underground spill containment tank..

- B. Water Wipe Makeup: Spills of 50% sodium hydroxide, 35% sulfonated castor oil or mixed water wipe solution will drain to the underground spill containment tank.

A spill in the sulfuric acid secondary containment area is neutralized with sodium bicarbonate. The neutralized solution is pumped into the spill containment tank.

Bulk chemicals for use in waste treatment are delivered to the pump house located at the southeast corner of waste treatment. Absorbents are kept in the pump house to contain any spills at the pump house.

- C. The First Response Team will:

1. Direct cleanup of minor spills. If the spill requires an outside Decontamination/ Clean Up contractor, the team will stand by to assist the contractor.
2. Prepare a written report describing what occurred and what actions were taken.

- D. The Chemical Emergency Coordinator

1. After an emergency, the emergency coordinator must provide for packaging and removal of collected waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
2. Ensures that no waste that may be incompatible with the released material is present until cleanup procedures are completed.
3. All emergency equipment is cleaned and available for use.

EMPLOYEE TRAINING

All Western Currency Facility employees receive Hazard Communications training through the Safety Department during the new employee training program and as a part of an ongoing Safety Training program.

Shipping/Receiving and General Stores material handling personnel receive additional training in the transportation of hazardous materials (DOT) and hazardous materials operations (HAZWOPER).

PLAN POSTING, REVIEW AND UPDATE

Copies of applicable procedures contained within this plan will be posted in the shop area for reference in the event of a spill or release.

A file copy will be maintained in the Safety and Environmental offices and Police Command Center. It is reviewed annually for updating in cases, such as, process changes, addition of new chemical materials, and employee turnover.

In the event of a plan update, a current copy will be forwarded to the City of Fort Worth Industrial Waste Section. This current plan is implemented as of May 1, 1998.

RESPONSIBILITIES OF PERSONNEL

- I. The Plant Manager is responsible for ensuring that facilities are maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste to air, soil, or surface water which could threaten human health or the environment.
- II. Safety and Occupational Health Specialist.
 - A. Ensures that the basic provisions of this manual are disseminated to all persons employed in the facility.
 - B. Ensures that appropriate personnel are trained to provide technical guidance for safely dealing with chemical emergencies.
 - C. Develops or provides an Emergency Spill Control Guide for dissemination to Chemical Emergency Response Team (CERT) members.
 - D. Maintains liaison with state and local emergency response teams to plan for emergency services in the event of a chemical disaster.

- E. When directed by the First Response Team, reports the emergency to the Plant Manager, including the potential extent of injuries and hazards to human health or the environment outside the facility.
- F. Assists the Chemical Emergency Coordinator (CEC) with the technical supervision of incidents involving releases of flammable hazardous materials.
- G. Serves as the assistant CEC, providing technical expertise in situations where chemical releases may have possible hazards to human health.
- H. Tests for airborne concentrations of the chemical contaminant.
- I. Recommends the appropriate personal protective equipment required for use by personnel during emergency response operations.
- J. Provides chemical toxicity information to the Clinic when first-aid or emergency treatment of personnel is required.
- K. Ensures that any personnel exposures to hazardous substances in excess of federal limits are documented.

III. Chemical Emergency Response Team (CERT).

The CERT is comprised of the Chemical Emergency Coordinator, the First Response Team, the Chief Stationary Engineer, the Utilities Control Team and Contract Safety Specialists.

- A. Chemical Emergency Coordinator (CEC). A CEC will be appointed in writing and made known to all holders of this manual. The CEC will be available or on call 24 hours per day. The responsibilities of the CEC are:
 - 1. Reports to the site to assume technical supervision of the control and cleanup of the spill or release of hazardous materials and to contact other members of the Chemical Emergency Response Team as required.
 - 2. Monitors and is familiar with all aspects of the Emergency Contingency Manual, all operations and activities of the facility, the facility layout and the location and characteristics of all hazardous chemicals handled.
 - 3. Maintains all records required by this manual.
 - 4. During an actual emergency, the CEC should take all reasonable measures necessary to ensure that chemical releases do not spread or recur in other areas of the facility.
 - 5. Immediately following the emergency, the CEC will provide for the treatment, storage and disposal of any recovered materials, including contaminated soil or surface water, and other waste materials generated from a fire, explosion or chemical release.
 - 6. Ensures that all equipment utilized during a chemical emergency is cleaned and restored to its original condition prior to the resumption of normal activities. This will include replenishing any supplies that may have been used from the emergency "Spill Karts".

7. If any or all parts of this plan fail, the CEC should evaluate why the plan was ineffective, and provide a corrective written addendum to be a permanent part of the Emergency Contingency Manual.
- B. First Response Team (FRT). The First Response Team is comprised of the Power Plant Stationary Engineers assisted by any Contract Safety Specialists currently on site. The duties of the First Response Team are:
1. After notification by the Command Center of a reported spill, obtain necessary personal protective equipment and report to spill location. Assess the size of the spill, determine if outside help needs to be called in and notify Command Center of perimeter to be established.
 2. Contain the spill, if at all possible, to prevent further spread of material into other parts of the facility.
 3. Have the Contract Safety Specialist contact the CEC and give an assessment of the situation.
 4. If possible, begin cleanup operations. If the spill is of a large quantity requiring an outside Decontamination/Clean Up Contractor, stand by to assist the Contractor, if needed.
 5. Provide the CEC with a written, after-the-fact report describing what happened and what actions were taken.

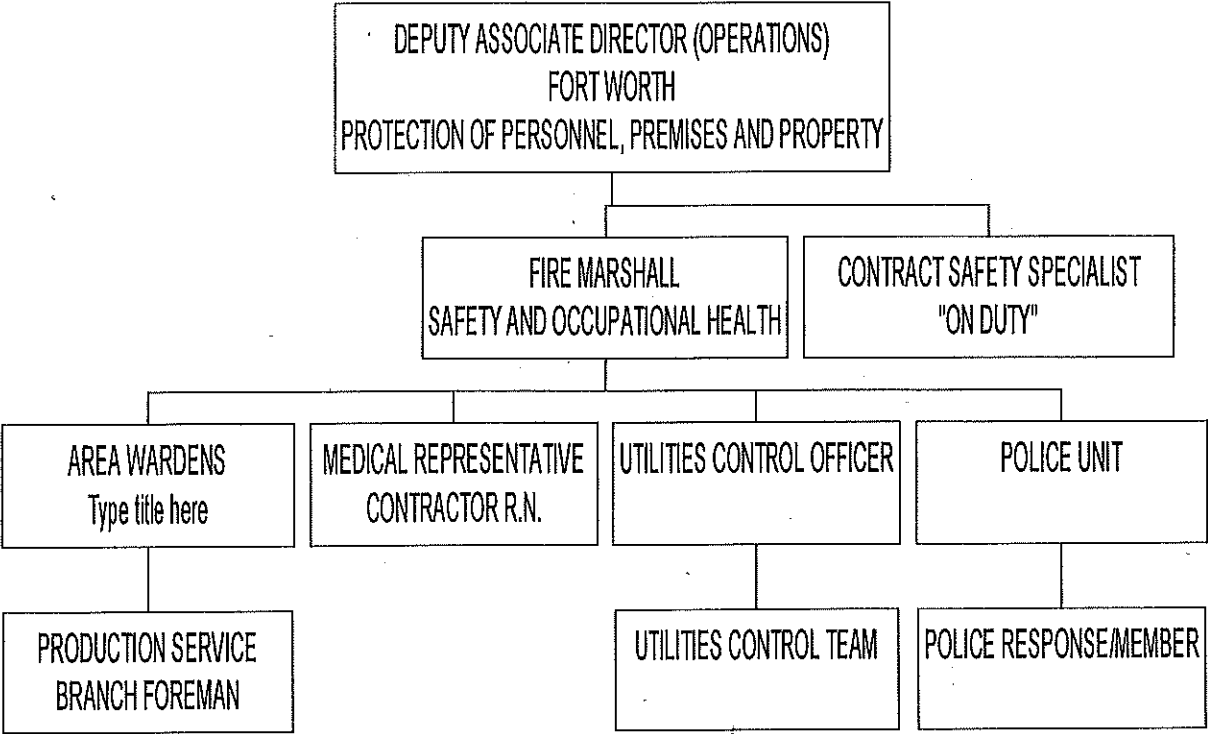
- C. Chief Stationary Engineer. The BEP's Chief Stationary Engineer is responsible for controlling building utilities during an emergency. Production equipment, such as presses, examining machines and COPEs, shall be controlled by the respective operators. The Chief Stationary Engineer serves as head of the Utilities Control Team and performs the following duties:
1. Establishes a plan to monitor mechanical devices, such as ventilation systems, water, gas and steam valves, power switches, etc., during emergencies.
 2. Dispatches individuals or teams to prearranged control points for preplanned or directed action.
- D. Utilities Control Team (UCT). The on-site building Operations and Maintenance Contractor personnel shall comprise the UCT. Under the direction of the BEP's Chief Stationary Engineer, the UCT will be responsible for controlling utilities during an emergency. The team shall report to pre-designated locations.
- E. Contract Safety Specialist: The Contract Safety Specialist shall respond to the notification from the Command Center to the First Response Team that there is a spill. The Contract Safety Specialist shall:
1. Assist the FRT in assessing and confining the spill. As soon as practical, notifies the CEC of the situation and relays any instructions from the CEC to the FRT.
 2. Ensure that the FRT and/or Decontamination/Clean Up Contractor is equipped with the proper personal protective clothing, supplies and equipment necessary to contain and clean up the spill or other waste materials prior to the resumption of normal operations.
- F. Medical Clinic Staff (MCS). The Medical Clinic Staff is responsible for training and equipping all personnel assigned to perform medical or first-aid services in an emergency, and for supervising emergency first-aid or medical self-help emergency operations within the building during an emergency. MCS duties include:
1. Selects a first-aid or medical treatment staging area during an emergency that involves a number of injuries.
 2. Directs first-aid operations and controls access to medical supplies, as required, to assure their proper use, conservation, and availability for emergency use.
 3. Ensures personal protective equipment is provided for Clinic Staff.
 4. Maintains liaison with Fort Worth area hospital emergency rooms and ambulance/flight transportation to coordinate emergency services as required.

G. Facilities Police. Police personnel are responsible for maintaining security during clean-up operations. Their duties include:

1. Notify the First Response Team when a chemical emergency is reported.
2. Control the perimeter established by the First Response Team.
3. If requested by the First Response Team, call 911 to report the emergency.
4. Notify roster officials to be contacted in the event of an emergency of the nature and location.
5. Assign police officers to exterior exits to perform the necessary security checks required in the event of evacuation.
6. In the event a total building evacuation becomes necessary, they shall man the Secondary Command Center, located in the Main Gate Office.

FIRE, CHEMICAL AND EMERGENCY CONTINGENCY MANUAL

9/26/94



FIRE, CHEMICAL AND EMERGENCY CONTINGENCY MANUAL

WESTERN FACILITY

9/26/94

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CHAPTER 1 - INTRODUCTION

1-1 INTRODUCTION. The Director, Bureau of Engraving and Printing (BEP) has the responsibility for minimizing danger to life and property arising from the effects of fire, explosions, hazardous chemical/waste spills and or disasters affecting the Bureau's employees, products, equipment and buildings. This plan has been developed for the Fort Worth, Texas Western Currency Facility to comply with:

(a) Occupational Safety and Health Standards 29 CFR 1910.38, Employee Emergency Plans and Fire Prevention Plans; and

(b) Environmental Protection Agency Regulations 40 CFR Part 264, Subpart D, Contingency Plan and Emergency Procedures other life or property threatening emergency contingency plans such as bomb threats, riots etc. are addressed by Security Manuals.

1-2 PURPOSE. The purpose of this Emergency Contingency Manual is to:

(a) Establish written policy;

(b) Delineate duties and responsibilities; and

(c) Outline training requirements; and

(d) Comply with the previously specified Federal Regulations

1-3. APPLICABILITY: The responsibility and procedures set forth in this manual apply to all property under the charge and control of the Deputy Associate Director (Operations) Fort Worth, and to all persons in or on such property.

1-4. LOCATION. The facility is in 3 buildings located at 9000 Blue Mound Road, Fort Worth, Texas and include:

(a) intaglio presses;

(b) waste water treatment operations;

(c) vehicle/hazardous material storage;

(d) hazardous waste storage out-buildings;

(e) VOC treatment equipment; and

(f) vault storage and other support activities.

1-5 OCCUPANCY. There are approximately 525 persons occupying the premisses, divided in 3 shifts as follows:

Day Shift - 302 persons
Second Shift - 76 persons
Third Shift - 132 persons

1-6. AMENDMENT OF THE CONTINGENCY MANUAL. The manual must be reviewed and amended immediately when:

- (a) Applicable regulations are revised
- (b) The plan fails in an actual or mock emergency
- (c) The facility changes in design, operations, mission or other circumstance that materially increases the potential for fire, explosion or release of hazardous material/waste or its constituents, or changes in the response necessary in an emergency;
- (d) The list of emergency coordinators changes; or
- (e) The list of emergency equipment changes.

1-7. MANUAL DISTRIBUTION: An updated copy of the Emergency Contingency Manual must be distributed as follows:

- (1) Central Files;
- (2) Environmental Office;
- (3) Security Office;
- (4) Police Operations Command Center;
- (5) Safety and Occupational Health Office;
- (6) The Fort Worth Emergency Management Office;
- (7) Currency Production Office;
- (8) Facility Management Office;

1-8. OFFICE OF PRIMARY RESPONSIBILITY. Safety, Health, Environmental Services and Compliance Staff.

CHAPTER 2 ORGANIZATION

2-1. RESPONSIBILITIES. The establishment of the Emergency Contingency Manual is the joint responsibility of all offices of the Western Currency Facility. The Safety and Occupational Health Office has primary responsibility for developing and maintaining the Manual. Personnel responsible for implementing the Manual will be recruited on an equitable basis from among all offices.

2-2. DESIGNATED OFFICIAL. The Deputy Associate Director (Operations), Fort Worth is responsible for overall policy and approval of an Emergency Contingency Manual for the protection of personnel, premises and property. In the event of a disaster, the Deputy Associate Director (Operations), Fort Worth is responsible for any statements to other government officials or the press. No statements regarding any disaster may be made without his prior approval.

2-3. SUCCESSION to COMMAND. To provide continuity, certain persons are designated to succeed to command should the Deputy Associate Director (Operations), Fort Worth be unable/unavailable to discharge his/her duties and responsibilities during a fire or chemical emergency. The succession to Command is as follows and in the areas identified in figure 1:

Richard Laird, Support Services Manager
Bruce Crouch, Production Manager
Security Manager

2-4. DESIGNATION of OTHER ORGANIZATIONAL PERSONNEL. The Western Currency Facility will provide the personnel to staff the organization as identified in figure 1. The duties and responsibilities of the organizational components are addressed in various areas of this plan.

2-5. BUILDING OCCUPANTS. All employees shall acquaint themselves with the alarm signals and emergency instructions contained in this manual. Each employee is required to respond correctly to alarms and directions by organization personnel during an emergency. Employees must follow the directions of and cooperate with organization personnel.

2-6. BASIC FUNCTIONS. The organization as shown in Figure 2 will perform the following functions:

a. Evacuation of Building Occupants: This function provides for the orderly planned and directed evacuation of building occupants in the event of an emergency. It is performed by the evacuation group under the direction of the Fire Marshal and Area Wardens.

b. First Aid: This function provides for emergency medical treatment by personnel trained in emergency first aid. It is performed by the Health Clinic personnel and any assistance by qualified WCF Police Unit personnel that they deem necessary.

c. Utilities Control: This function provides for control of utilities in the building in the event of an emergency. It includes the control of all electrical and mechanical equipment; water, gas and steam valves and piping; power switches; ventilation and refrigeration devices; and any other such utilities and systems in the building. Production equipment shall be controlled by their operators.

d. Chemical Emergency: This function provides for response to a chemical spill or release of a hazardous material/waste to ensure proper containment, cleanup, disposal, personal protective equipment, property protection, environmental protection and notification of appropriate federal and/or local officials when necessary.

e. Police Officers: This function provides for the security of products and other property during an emergency. WCF Police Officers also assist in the orderly evacuation of personnel. WCF Police Officers may be requested to assist medical personnel.

f. Civil Defense: This function provides for emergency response to hostile, sabotage or natural disaster.

CHAPTER 3 - HAZARDOUS MATERIALS OVERVIEW

3-1 NEW HAZARDOUS MATERIALS.

a. Containerized Material: Hazardous materials in the form of new, raw materials for use in the various production and support operations are delivered to incoming materials storage at room P-175 for interim storage or transported directly to the using activity.

STORAGE AREAS FOR HAZARDOUS MATERIALS ARE:

| ROOM # | NOMENCLATURE |
|--------|----------------------------|
| P171 | WASTE TREATMENT |
| P127 | PRODUCTION SHOP |
| P120 | PLATE MAKING |
| P100A | CYLINDER CART STORAGE |
| P100 | PRESS ROOM |
| P101 | C.O.P. |
| P155 | INK STORAGE |
| S146 | CHEMICAL DILUTION |
| S136 | CORROSIVE CHEMICAL STORAGE |
| S150 | WASTE TREATMENT TANKS ROOM |
| S147 | LABORATORY |
| S151 | ACID AREA |
| S148 | CENTRIFUGE ROOM |
| S112 | INK MILL ROOM |

In general, the hazardous materials consist of flammable and combustible liquids. Additionally, storage of new hazardous materials in these areas consist of compressed flammable gases, caustics in 55 gallon drums, and acids in smaller packages.

a. Bulk Storage Tanks: Hazardous materials in the form of new raw materials in bulk quantities are stored in above and underground locations. Bulk hazardous materials are pumped via piping to production areas or dispensed into portable containers.

3-2 HAZARDOUS WASTE MATERIALS:

a. General Management Procedures: Hazardous wastes are generated in almost all production areas. In general, hazardous wastes are to be handled in the same manner as new hazardous materials. The labeling requirements that must be followed for compliance with EPA regulations is where the difference is identified.

The area supervisor, for preparing hazardous waste for transfer, must complete and attach BEP Form 2428, Hazardous Waste Accumulation Record, to the waste container.

When an area has containers ready for disposal, the supervisor requests transport of the material to the designated storage area. The Western Currency Facility has assigned the Hazardous Waste Coordination function to the Chemical Engineer. After the containers are deposited in the Hazardous Material Storage Sheds, the Hazardous Waste Coordinator has the responsibility to ensure that the Western Currency Facility complies with all Federal, State, local and BEP regulations and directives. After the drums are in the Hazardous Material Storage Buildings the coordinator will confirm container labeling and arrange for disposal, ensuring proper manifesting and transport to an authorized disposal site.

3-3. INVENTORY of HAZARDOUS MATERIALS. The Safety and Occupational Health Office must maintain a complete update inventory of the hazardous materials, by location, in the Western Currency Facility. This inventory provides immediate data on the materials stored and used in the areas, maximum quantity and health, flammability and reactivity hazards relative to the material. The Police Operations Command Center located in the Hardened Command Center will maintain a duplicate copy of the inventory for Fire Department use. Each work center will maintain a copy of the Material Safety Data Sheets (MSDS) for the material in use in the area.

3-4. PERSONNEL TRAINING. Training for personnel handling Hazardous Material will be given by the Safety and Occupational Health Office or by contracted personnel. Production services personnel, who are primary movers of hazardous waste and spilled chemical materials will receive specialized training by a nationally recognized training source.

CHAPTER 4 FIRE PROTECTION AND

EMERGENCY EVACUATION PLAN

4-1. FIRE PREVENTION. In a facility like the Western Currency Facility that stores, processes and uses combustible and flammable liquids in copious quantities and other hazardous material, fire prevention is necessary. To prevent fires from occurring and, in the event of a fire, to decrease the danger and damage, each employee must follow these rules:

- a. Maintain good housekeeping practices at all times.
- b. Identify and correct any apparent fire safety hazard.
- c. Smoke only in designated areas.
- d. Do not throw matches, cigars, cigarettes or pipe ashes into waste baskets or on floors.
- e. Store oily rags or similar flammable materials in containers approved and supplied for that purpose.
- f. Do not use hot plates, irons, or similar heat producing devices unless such devices are authorized by the Safety and Occupational Health Office and installed and maintained in accordance with fire codes.
- g. Maintain exits and passageways clear to permit free movement of personnel and firefighting efforts.
- h. Store all flammable liquids in approved containers.
- i. Maintain only one 24 hour supply of flammable materials in work area, not to exceed 15 gallons per piece of equipment.
- j. Use only U.L. listed, rotary type dispensing pumps, in transferring flammable liquids.
- k. Clean up all spills and dispose of waste as prescribed.
- l. Do not tamper with portable fire extinguishers.
- m. Keep all potential ignition sources away from flammables and combustibles.

4-2. FIRE PROTECTION EQUIPMENT and SYSTEM

- a. Command Center.

1. The Police Operations Command Center in conjunction with the Facilities Management Center shall serve as the Command Center for emergency operations and the Facilities Management Center maintains the Facilities Management System which has the following features:

- (a) Fire alarm initiating device zone locator.
- (b) Fire alarm initiating device description.
- (c) Recorder
- (d) Alarm transmitter.
- (e) Monitoring of fire suppression systems.
- (f) Supervises fire systems circuits.

2. The Police Operations Command Center maintains the ring down phone system to all emergency response forces.

b. Communications. In the event of a fire, Police personnel and other responding personnel dispatched must be assigned a portable radio for communications back to the Police Operations Command Center who in turn will relay all information to the Facility Management Center. Other communications will be via internal telephone system.

EXCEPTION: Radios will not be used during a bomb threat or suspected bomb threat.

c. Fire Alarm System. Upon activation of any initiation device the FMS transmits the following audio alarm signals:

1. A ten-second alert tone to the entire building.

2. After the ten-second alert tone, transmit a pre-recorded emergency announcement continuously until manually stopped. If the emergency message fails the alert tone will continue. Two messages will be transmitted:

(a) Alarm zone - Both strobe light and evacuation instructions are activated advising personnel of emergency condition and to evacuate via the nearest exit.

(b) All other building areas - No Strobe Light is activated and advises personnel to remain and await further instructions.

Additionally, the system may be interrupted with live emergency communications.

4-3. DUTIES and RESPONSIBILITIES

a. The Deputy Associate Director (Operations), Fort Worth of the Western Currency Facility is responsible for overall policy and approval of an Emergency Contingency Plan for the protection of personnel, premises and property.

b. Fire Marshall (Safety and Occupational Health Specialist). The Fire Marshal's duties are:

1. Ensure proper dissemination of the Emergency Contingency Plan.

2. Coordinate with Facilities Management, as necessary, for fire systems maintenance and improvements.

3. Ensure that the roster for organization personnel involved in emergency operations is maintained and posted.

4. Ensures that all necessary actions are taken to maintain safe and efficient operations in an emergency.

5. Ensures orderly movement of all personnel in the facility during the emergency.

6. Maintains liaison with local authorities.

7. Insure that appropriate training courses are conducted, using local organizations as are available.

8. With the approval and cooperation of the Facilities Manager, coordinates and arranges for and directs civil defense, fire and evacuation drills.

9. Works closely with and cooperates with local and state civil defense personnel in matters pertaining to facility plans, organization and operation.

10. Plans personnel movement routes and establishes procedures.

11. Assures that all personnel responsible for occupant evacuation perform their duties and responsibilities.

12. Supervises and directs movement of personnel, during drills and actual emergencies, inside and outside of the building.

13. Reports to scene of emergency to assess situation and evaluate evacuation needs.

c. Area Wardens. Under the direction of the Fire Marshall, the Area Wardens expedite the evacuation of personnel in their area. The Area Wardens duties include:

1. Assures that evacuation routes are identified, clear, posted and known by the regular occupants.

2. Directs the orderly flow of personnel along the prescribed routes.

3. Immediately establishes the alternate route if the normal route is blocked by the emergency.

4. Appoints a column leader to lead personnel along the evacuation route.

5. Assures the area has been evacuated prior to their departure.

6. Maintains a listing of handicapped personnel in their area. The list will include:

(a) Name

(b) Room number

(c) Any evacuation device, assistance needed and the location of the device.

7. Reports to the Police Operations Command Center after evacuation and role has been taken. Reports include, area, number of personnel in area and number at role.

d. Medical Representative. Serves as the coordinator for first-aid services. They are responsible for all personnel assigned to perform first-aid in an emergency and supervising those operations. Their duties include:

1. Selection of a first-aid or medical treatment staging area during an emergency that involves a number of injuries.

2. Directs first-aid operations and controls access to medical supplies, as required, to assure proper use, conservation and availability.

3. Maintains liaison with the local hospital to coordinate any emergency services required.

e. Utilities Officer. Responsible for controlling building utilities other than production equipment, such as presses, coilers, computers, etc., during an emergency. Production equipment shall be controlled by the respective operators. The Utilities Officer performs the following duties:

1. Establishes a plan to attend utilities during an emergency. Identifying which utilities are necessary for operations and which should be secured from operations.

2. Dispatches individuals or teams, at the sound of emergency alarms, to prearranged control points to perform a preplanned or directed action.

f. WCF Police Unit. Their duties include:

1. Dispatch police response team to investigate reported emergency.

2. Ensure roster officials to be contacted in the event of an emergency are notified of the nature and location.

3. Assign police officers to exterior exits to perform

the necessary security checks required in the event of evacuation.

4. In the event a total building evacuation becomes necessary, they shall man the Secondary Command Center, located in the Main Gate Office.

g. Police Response Member/Team. Their duties include:

1. Investigate all alarms or reports.
2. Report to Shift Commander findings.
3. Secure area and assist as necessary.

4-4. FIRE PROCEDURES

a. Unconfirmed Fire. Upon seeing or smelling smoke from an unidentified source, the following actions shall be taken by an employee:

1. Notify supervisor.
2. The supervisor or employee shall telephone the Command Center.
3. The Police Watch Commander will dispatch the Police Response Team to the area. They shall conduct a thorough and rapid search of the area and report via radio, the findings of the search.
4. The Police Watch Commander shall also ensure the personnel on the roster of officials to be contacted in the event of an Unconfirmed Emergency are contacted via the Police/Management intercom system immediately.
5. If the fire is confirmed, the actions outlined in 4.b., for a confirmed fire, shall be followed. If the fire is NOT confirmed all personnel will assume their normal routine.

Upon receipt of an unconfirmed fire alarm signal from any other source the FMS/Police shall take the actions described in 4-4.a.(3) through (5) shall be followed.

b. Confirmed Fire. Upon an employee discovering a fire and no alarm has been transmitted via the fire system the following actions shall be taken:

1. The supervisor or employee shall notify the Command Center.
2. The operator of any equipment affected shall, if safe to do so, shut it down.
3. Employees in the area may commence fire fighting actions using portable extinguishers, if properly trained in

their use and if the fire is in the beginning stages only.

4. The supervisor or employee shall pull a manual fire alarm station and telephone the Command Center.

5. They shall provide the following information:

- (a) Location of fire.
- (b) Type of fire; paper, flammable, electrical or burning metals.
- (c) Extent of fire involvement

6. The Police Watch Commander will ensure that all personnel on the Roster of Officials to be contacted in the event of an emergency are notified. They should relay the same information to those personnel as received from the Police Response Team.

7. The Police Response Team and Fire Marshall shall determine if outside assistance is required and notify the Police Watch Commander.

8. If notified that outside assistance is required the Police Watch Commander or Officer-In-Charge shall activate the transmit signal to the Fort Worth Fire Department.

c. When outside assistance is obtained the Police Watch Commander or Officer-In-Charge shall dispatch an officer to direct the Fire Department to the nearest point of entry to the fire.

d. The Fire Marshal shall meet the Fire Department and provide the following:

- 1. Exact location of fire.
- 2. Type of fire.
- 3. Extent of Building involvement.
- 4. Building is totally evacuated or location of personnel remaining and any unaccounted for personnel.

4-5. EVACUATION PLAN

a. The Security Manager serves as the control point in the event an emergency results in the need for evacuation of personnel. Under his/her direction the Fire Marshal develops evacuation plans and implements these plans during the emergency with the assistance of the WCF Police Unit Personnel.

b. When to Evacuate. The evacuation plan contained herein shall be implemented when a fire or other emergency is confirmed

and outside assistance is called to handle the emergency. At this time, it is probable that personnel directly in danger have already evacuated. The supervisor in the immediate area, or personnel working in the area, if no supervisor is present, shall evacuate the area affected, when it has been determined that the emergency is beyond control and the situation is life threatening. Chemical emergencies (release or spills) will be handled on a case by case basis. Evacuation for a chemical emergency will take place only when there is a threat to life due to its health, fire or reactivity hazard.

c. Emergency Organization Response. The Emergency Organization Personnel shall respond when the fire alarm system has been activated or when otherwise notified. They shall assume their responsibilities as outline in this plan.

d. Emergency Evacuation Route Diagrams. These are posted in various areas throughout the facility and show the location of primary and secondary exits from each area. Emergency gathering areas are identified in Appendix A of this plan.

e. Facility Evacuation Plan.

(1) The extent of evacuation will depend on the location, extent and potential of the emergency.

(2) Upon notification of the necessity for evacuation it is important that procedures be known in advance. Delays caused by unsurity could cause injury or death which might be avoided if personnel were prepared in advance.

(3) The Fire Marshall under the direction of the General Manager will decide when evacuation orders will be given. The Area Wardens may decide to evacuate their area if the emergency is sufficient and no evacuation order has been given.

(4) Each Area Warden will upon notification to evacuate instruct personnel to the nearest route. These routes will be in accordance with the posted routes.

(5) Upon evacuation each Area Warden will report to the Police Operations Command Center that their area is clear, a roster has been taken and any deficiencies in the roster.

(6) Prior to evacuation personnel shall take the following action whenever possible unless such action would endanger their lives:

(a) Place exposed records in cabinets or desks drawers or place covers over the records to protect them against damage.

(b) Place classified documents in safes and secure their location.

(c) Disconnect electrical equipment.

(d) Shut down all equipment such as presses, computers, coilers, etc.

(e) Close, but DO NOT LOCK, the door when the last person leaves the room.

f. Evacuation of Handicapped Personnel. Handicapped personnel unable to evacuate without assistance will be escorted by one or more persons assigned to that duty in writing by the supervisor of the area.

4-6. TRAINING.

a. General. A continuing program of training and education for all personnel is imperative to ensure maximum effectiveness. Personnel assigned duties and responsibilities require and shall receive specific training in the skills required to perform their duties, e.g., first-aid, firefighting, etc. The Safety and Occupational Health Office is responsible for identifying the needs and for bringing those needs to the attention of the proper agency official.

b. Drills. Drills familiarize personnel with the actions required during an emergency. Evacuation drills will be conducted periodically under the direction of the Safety and Occupational Health Specialist. Drills maybe announced periodically and evacuation drill using alternate evacuation routes by simulating blocked normal exits will be conducted.

4-7. REPORTING PROCEDURES. All fires must be reported to the Safety and Occupational Health Office and the Police Operations Command Center.

a. Police Services Section Fire Report. BEP Form 1241 will be completed by one of the Police Officers responding to the fire. A copy will be forwarded to the Safety and Occupational Health Office.

b. Safety and Occupational Health Office Fire Report. Any fire resulting in personal injury, death, or property damage in excess of \$500.00 will be investigated. A report shall be prepared giving recommendations to prevent similar incidents. The report shall be distributed to the Supervisor of the Office that was involved and to the Deputy Associate Director (Operations) , Western Currency Facility.

CHAPTER 5

CHEMICAL EMERGENCY RESPONSE

5-1. DUTIES and RESPONSIBILITIES.

a. The ~~Deputy Associate Director (Operations)~~ ^{Plant Manager} is responsible for ensuring that facilities are maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste to air, soil, or surface water which could threaten human health or the environment.

b. Safety and Occupational Health Specialist.

(1) Ensures that the basic provisions of this manual are disseminated to all person employed in the facility.

(2) Ensures that appropriate personnel are trained to provide technical guidance for safely dealing with chemical emergencies.

(3) Develops or provides an Emergency Spill Control Guide for dissemination to Chemical Emergency Response Team (CERT) members.

(4) Maintains liaison with state and local emergency response teams to plan for emergency services in the event of a chemical disaster.

(5) In the event of human health or environment threatening disasters within the Western Currency Facility, reports to the General Manager the potential extent of injuries and hazards to human health or the environment outside the facility.

(6) Assist the Chemical Emergency Coordinator (CEC) with the technical supervision of incidents involving releases of flammable hazardous materials.

(7) Serves as the Personnel Movement Officer in the event that evacuation is necessary.

(8) Serves as the assistant CEC, providing technical expertise in situations where chemical releases may have possible hazards to human health.

(9) Tests for airborne concentrations of the chemical contaminant.

(10) Recommends the appropriate personal protective equipment required for use by personnel during emergency response operations.

(11) Provides chemical toxicity information to the Clinic when first-aid or emergency treatment of personnel is required.

(12) Insures that any personnel exposures to hazardous substances in excess of Federal limits are documented.

c. Chemical Emergency Response Team (CERT).

(1) Chemical Emergency Coordinator (CEC). A CEC will be available or on call twenty-four hours per day. The CEC will be appointed in writing and a listing will be distributed to holders of this manual. The responsibilities of the CEC are:

(a) Reports to the site to assume technical supervision of the control and cleanup of the accidental spill or release of hazardous materials and to contact other members of the Spill Control Team as required.

(b) Monitors and is familiar with all aspects of this Emergency Contingency Manual, all operations and activities of the facility, the location and characteristics of waste chemicals handled, and the facility layout.

(c) Maintains all records required by this manual.

(d) During an actual emergency, the CEC should take all reasonable measures necessary to ensure that chemical releases do not spread or recur in other areas of the facility.

(e) Immediately following the emergency, the CEC will provide for the treatment, storage and disposal of any recovered materials, including contaminated soil or surface water, and other waste materials generated from a fire, explosion or chemical release.

(f) Ensures that all emergency equipment utilized during a chemical emergency is cleaned and restored to its original condition prior to the resumption of normal conditions. This will include replenishing any supplies that may have been used from the emergency "SPILL KARTS".

(g) If any or all parts of this plan fail, the CEC should evaluate why the plan was ineffective, and provide a corrective written addendum to be a permanent part of the Emergency Contingency Manual.

d. Medical Clinic Staff (MCS). The Medical Clinic Staff is responsible for training and equipping all personnel assigned to perform medical or first-aid services in an emergency, and for supervising emergency first-aid or medical self-help operations within the building during an emergency. MCS duties include:

(1) Selects a first-aid or medical treatment staging area during an emergency that involves a number of injuries.

(2) Directs first-aid operations and controls access to medical supplies, as required to assure their proper use, conservation, and availability for emergency use.

(3) Ensures personal protective equipment is provided for Clinic Staff.

(4) Maintains liaison with Forth Worth area hospital emergency rooms and ambulance/flight transportation to coordinate emergency services as required.

Chief Station by
e. ~~Utilities Officer.~~ The Utilities Officer is responsible for controlling building utilities during an emergency. Production equipment such as presses, coilers, computers and other production equipment shall be controlled by the respective operators. The Utilities Officer serves as head of the utilities control group and performs the following duties:

(1) Establishes a plan to attend mechanical devices; ventilation, water, gas, and steam valves; power switches; etc. during an emergency.

(2) Dispatches individuals or teams, at the sound of emergency alarms, to prearranged control points for preplanned or directed action.

Building Operation and Maintenance Cont
f. ~~Utilities Control Team.~~ Under the direction of the ~~Utilities Officer,~~ the Utilities Control Team is responsible for controlling utilities during an emergency. During emergencies they report to the Utilities Officer in the predesignated location.

g. Facilities Police. Police personnel maintain immediate security during the cleanup and maintain the communication link with the Command Center for coordination of outside emergency services as required.

h. Contract Safety Specialist. During the evening and midnight shifts, or when a contract specialist is working, they will respond to the initial notification of a chemical release. If the release is of a minimal/no hazard chemical, as outlined in paragraph 3 of this section, the Safety Specialist will supervise the clean-up operation. If the release is of a higher magnitude, the Safety Specialist will notify the Command Center to implement this manual.

i. Production Service Branch Foreman. Ensures that the clean-up crew is equipped with personal protective clothing, supplies and equipment necessary to confine and clean up the spill or other waste materials prior to the resumption of normal operation.

5-2. CHEMICAL SPILL/RELEASE EMERGENCY PROCEDURES and CLASSIFICATION of SPILLS.

a. Classification of Spills/Releases

(1) Non-emergency Spills/Releases. Any spill/release of a relatively small quantity, where the chemical poses minimal or no hazard to human health or the environment is considered to be a spill/release of the non-emergency type.

(2) Emergency Spills/Releases. Any spill/release of major proportion, that is, a large volume (a 55 gallon drum or greater) or one involving a potentially life or environment threatening chemical reaction is considered to be an emergency spill/release.

b. Reporting Procedures.

(1) Employee's Responsibility.

(a) Any employee who discovers or is involved in a spill of a chemical will immediately report the spill to the supervisor of the area in which the spill has occurred.

(b) If there is no supervisor present or if the incident occurs in a public area, the employee will assume the supervisor's responsibility.

(c) If a materials handling vehicle is involved, the employee will also immediately report to the Supply Section supervisor.

(2) Supervisor's Responsibility.

(a) Upon receipt of a report of a chemical spill in his/her area, the supervisor will obtain the following information.

1. The amount of the spill, i.e., quart, 5 gallon pail, 55 gallon drum.

2. The name of the substance, if possible. This may be obtained, in some instances, from the container markings.

3. The location of the spill.

(b) After assessing the spill, the supervisor will decide if it is classified as an emergency or non-emergency spill, as identified previously. If the spill does not constitute an emergency, the supervisor shall contact the Chemical Emergency Response Team Coordinator to have the spill cleaned up in accordance with this manual.

(c) If the Supervisor assesses the spill as an

emergency, the Supervisor must contact the Safety Specialist on duty. If the Safety Specialist cannot be reached the supervisor shall contact the Police Operations Command Center and inform him/her of the details of the emergency and request they contact the officials on the Roster of Officials to Be Contacted in the Event of an Unconfirmed Emergency.

(3) Safety and Occupational Health Specialist
Responsibility: In the absence of the CEC, assumes the responsibilities of the CEC.

(4) Police Operations Responsibility: Contact emergency notification roster officials as instructed by the CEC or the Safety and Occupational Health Specialist, as applicable.

(5) Chemical Emergency Coordinator's (CEC)
Responsibility:

(a) Shall contact the Senior Police Watch Commander to have the clean up crew respond.

(b) Assess the spill and notify the Police Operations Command Center to contact the appropriate officials on the appropriate roster.

c. Emergency Procedures.

(1) Whenever there is an imminent or actual emergency situation, the CEC must immediately:

(a) Activate internal communications systems, to notify all facility personnel;

(b) Notify the Police Operations Command Center to initiate emergency procedures; and

(c) Inform the Police Operations Command Center if appropriate state or local agencies with designated response roles must be called for assistance.

(2) Whenever there is a release, the CEC must immediately identify the character, source and amount of any released materials. He/she may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

(3) Concurrently, the CEC must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion.

(4) If the CEC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment outside the facility, he/she must report the findings as follows:

(a) If the findings indicate that evacuation of local areas may be advisable, immediately notify appropriate local authorities. Remain available to help appropriate officials decide whether local areas should be evacuated; and

(b) Immediately notify the National Response Center using the 24-hour toll free number (800) 424-8802. The report must include:

- (1) Name and telephone number of reporter;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health or the environment outside the facility.

(c) During an emergency, the CEC must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released material and removing or isolating containers.

(d) If the facility stops operations in response to a fire, explosion or release, the CEC must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(e) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

(f) The CEC must ensure that, in the affected area(s) of the Facility:

(1) No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency manual is cleaned and fit for its intended use before operations are resumed.

(3) The CEC must notify the EPA Regional

Administrator and appropriate State and local authorities, that the facility is in compliance with the applicable sections of this manual before operations are resumed in the affected area(s) of the facility.

(g) The CEC must note in the operating record the time, date, and details of any incident that requires implementing the contingency manual. Within 15 days after the incident, a written report on the incident must be submitted to the EPA Regional Administrator. The report must be recorded on Forms 2553 "Chemical Emergency Chronological Log" and 2554 "Spiller's Report" and must include:

(1) Name, address and telephone number of the Facility Manager;

(2) Name, address and telephone number of the facility;

(3) Date, time, and type of incident (e.g. fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

(h) The CEC should ensure that the "Spiller's Report" is completed and included in the incident documents.

d. Non Emergency Procedures.

1. In the event of a spill of only slightly hazardous chemicals which occur while work is being performed (i.e. in production areas, laboratories, etc.) responsible individuals should attempt to minimize or control further spillage. This may be accomplished by:

(a) Rotating a drum or container in such a way that it no longer leaks.

(b) Placing a small bottle or container which is leaking or spilled in an upright position (or in a position that it no longer leaks), or, placing a small container in a plastic bag or secondary container.

(c) An attempt should be made to limit the extent of the spill by using available spill control pillows to build a dike or wall. The CEC should be notified of the spill, and procedures taken to dispose of the clean up materials properly.

2. The recommended procedures for spill clean up are as indicated below:

(a) Place the spill control pillows around the spill from the outer perimeter of the spill. As the spill is absorbed, move the pillows inward to collect the spill until it is totally absorbed by the spill control pillows.

(b) If the chemical involved is a flammable liquid, keep any sources of ignition out of the immediate area.

(c) After all clean up procedures are completed, all personal protective equipment must also be cleaned or disposed of as appropriate. Reusable equipment must be returned to the "Spill Kart". Return the "Spill Kart" to its designated location and commence replacement of materials used in the clean up.

(d) All contaminated waste materials used to clean up the spill must be containerized, labeled and properly disposed of as hazardous waste.



DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND PRINTING
FORT WORTH, TEXAS 76131

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January 22, 1998

Waste Evaluation Section/MC-129
Texas Natural Resources Conservation Commission
12100 Park 35 Circle
Austin, Texas 78753

The Bureau of Engraving and Printing's Annual Waste Summary for the Western Currency Facility at 9000 Blue Mound Road, Fort Worth, Texas is enclosed.

If you have any questions concerning these reports, please direct them to Colleen McKinney at (817) 847-3820.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Leon Griffin", is written over the word "Sincerely,".

D. Leon Griffin, Manager
Technical Support Division

WASTE EVALUATION SECTION
MC 129
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087

TELEPHONE: (512) 239-6832

Leon Griffin
Department of the Treasury
9000. Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|------------------|-------------------------|-------------------------|-------------------------|-------------------------|------------------|-------|------------------|-----|-----------------|---------------------|---|-------------------|--------------------------|-------|
| 0002209H | D001 | 31 | 35 | 39 | 15700 | P | M061 | 70 | Z0047 | TND000614321 | Waste oil from equipment maintenance in the printing pr | | 16400 | P |
| | | | | | 700 | P | M141 | 70 | 001 | | | | | |
| | | | | | | | M | 70 | | | | | | |
| | | | | | | | M | 70 | | | | | | |
| | | | | | | | M | 70 | | | | | | |

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|------------------|-------------------------|-------------------------|-------------------------|-------------------------|------------------|-------|------------------|-----|-----------------|---------------------|---|-------------------|--------------------------|-------|
| 0003203H | D001 | 31 | 35 | 39 | 6700 | P | M061 | 70 | Z0047 | TND000614321 | Spent solvent from press roll cleaning and spill collec | | 7300 | P |
| | | | | | 600 | P | M141 | 70 | 001 | | | | | |
| | | | | | | | M | 70 | | | | | | |
| | | | | | | | M | 70 | | | | | | |
| | | | | | | | M | 70 | | | | | | |

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

1-15-98

Date

1-22-98

Date

**WASTE EVALUATION SECTION
MC 129
INDUSTRIAL AND HAZARDOUS
TEXAS NATURAL RESOURCE C
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087**

**Your SOLID WASTE
REGISTRATION NUMBER**

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Report for: 1997

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TELEPHONE: (512) 239-6832

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

22 **NO REPORT REQUIRED** {See 30 TAC 335.9(a)(3); also see instructions}

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|------------------|-------------------------|-------------------------|-------------------------|-------------------------|--|---------------------------|-------|
| 000411QH | 0002 | 0000 | 0000 | 0000 | Corrosive liquid from printing rinse collection pit in | 86.00 | P |
| QUANTITY HANDLED | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | | |
| 4200 | M121 | | Z0047 | TND000614321 | | | |
| 4400 | M141 | | 001 | | | | |
| | M | | | | | | |
| | M | | | | | | |

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Colleen McKinney

Preparer (PRINT NAME) : _____

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinnery
Signature of Preparer

Signature of Preregar

Signature of Author

any position in the

1/5/02

Date _____

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Notes

ANNUAL WASTE SUMMARY

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Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

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EPA ID #

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| 0010301H | 31 | 0001 | 35 | 39 | 450 | P | M132 | 70 | Z0047 | TND000614321 | | Spill cleanup of oils/solvents. Oils/solvents are used | 450 | P |
| | 57 | | | | | | | | | | | | | 56 |
| | 57 | | | | | | | | | | | | | 47 |
| | 57 | | | | | | | | | | | | | 117 |
| | 57 | | | | | | | | | | | | | 117 |
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| | 57 | | | | | | | | | | | | | 117 |

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 0011309H | 31 | 0009 | 35 | 39 | 1350 | P | M019 | 70 | Z0047 | TND000614321 | | Waste mercury devices, lamps, switches, instruments, etc. | 1350 | P |
| | 57 | | | | | | | | | | | | | 56 |
| | 57 | | | | | | | | | | | | | 47 |
| | 57 | | | | | | | | | | | | | 117 |
| | 57 | | | | | | | | | | | | | 117 |
| | 57 | | | | | | | | | | | | | 117 |
| | 57 | | | | | | | | | | | | | 117 |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney
Signature of Preparer
D. Leon Griffin
Signature of Authorized Agent

1-15-98
Date

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WASTE EVALUATION SECTION
MC 125
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13067
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Leon Griffin

Department of the Treasury

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Fort Worth, TX 76131-3304 817-847-3887

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| 0012-103H | 31 | 35 | 39 | 43 | 57 | 68 | M | 70 | 71 | 76 | 88 | Depleted nickel baths from the electroplating area. Haz | 47 | 56 |
| | 57 | 67 | 71 | 76 | 57 | 68 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 68 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 68 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 68 | M | 70 | 71 | 76 | 88 | | 117 | |

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 00133101 | 31 | 35 | 39 | 43 | 57 | 66 | D | 70 | 71 | 76 | 88 | Waste carbon cartridges enclosed in metal casings. Moun | 47 | 56 |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | 76 | 88 | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | 76 | 88 | | 117 | |

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☐ REVISED SUMMARY

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YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT
TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 00-163-10-1 | 31 | 35 | 39 | 43 | 57 | 66 | M | 70 | 71 | | | Debris - rags, absorbents, spill pigs, sponges, pads fr | 47 | 56 |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 00-17-104H | 31 | 35 | 39 | 43 | 57 | 66 | M | 70 | 71 | | | Waste hydrochloric acid from the chemical cleaning of p | 47 | 56 |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |
| | 57 | 67 | 71 | 76 | 57 | 66 | M | 70 | 71 | | | | 117 | |

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinney

Preparer, (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

1-15-98

Date

1-22-98

Page 6 of 19

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

Your
EPA ID #

T X 1 2 0 0 9 3 9 6 2 1

Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

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| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|--|--------------------------|-------|
| 00-14307-1 | | 31 | | 35 | 39 | | | Waste nickel solids. Nickel plated printing plates are | | 56 |
| | | 66 | M | 70 | 71 | | | | | 47 |
| | | 66 | M | 70 | 71 | | | | | 56 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|--|--------------------------|-------|
| 00153101 | | 31 | | 35 | 39 | | | Drained oil filters from equipment and vessel maintainan | | 56 |
| | | 66 | P | 70 | 71 | | | | | 47 |
| | | 66 | M | 70 | 71 | | | | | 56 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |
| | | 66 | M | 70 | 71 | | | | | 117 |

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Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney
Signature of Preparer
D. Leon Griffin
Signature of Authorized Agent

1-15-98

Date

1-22-98

TELEPHONE: (512) 238-6332

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

Your
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SUMMARY STATUS

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TEXAS WASTE CODE 001811QH

EPA HAZARDOUS WASTE NO. 31 35 38 43

QUANTITY HANDLED 3 5 0

SYSTEM TYPE CODE M 1 2 1

RECEIVER'S EPA ID # T N D 0 0 0 6 1 4 3 2 1

WASTE DESCRIPTION Waste printing rinse from bottom of waste treatment fan

COMMENTS

RECEIVER'S EPA ID #

WASTE DESCRIPTION

COMMENTS

RECEIVER'S EPA ID #

WASTE DESCRIPTION

COMMENTS

RECEIVER'S EPA ID #

WASTE DESCRIPTION

COMMENTS

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WASTE DESCRIPTION

COMMENTS

RECEIVER'S EPA ID #

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Preparer (PRINT NAME)

D. Leon Griffin

Authorized Signatory (PRINT NAME)

Signature of Preparer

Date

Page 8 of 19

WASTE EVALUATION SECTION
MC 129
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087
TELEPHONE: (512) 239-6832

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

Your
EPA ID #

TX 1200939621

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

SUMMARY STATUS

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 0020103H | 31 | 0007 | 0002 | 0008 | 1800 | 57 | M111 | 70 | Z0047 | TND000614321 | | Depleted chromic acid bath from chromium plating of car | 47 | 56 |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|--|--------------------------|-------|
| 0021110H | 31 | | | | | 57 | | | | | | Untreated printing rinse disposed in tanktrucks during | 47 | 56 |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |
| | | | | | | 57 | | | | | | | | |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Signature of Preparer

1-15-98

Date

1-22-98

Signature of Authorized Agent

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

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Report for: 19 97

FOR DATA YEAR: 1997

Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

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SUMMARY STATUS

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|---------------------|------------------|-------|---------------------|-----|--------------------|----------------------------|----------------------------|----------------------------|---------------------|----------|---|--------------------------|-------|
| 0022309H | 650 | P | M121 | 70 | Z0047 | 39 | 43 | 43 | TND000614321 | | Depleted wet lead acid batteries from plant use. Hazard | 47 | P |
| | 300 | P | M141 | 70 | 001 | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|------------------|-------|---------------------|-----|--------------------|----------------------------|----------------------------|----------------------------|---------------------|----------|---|--------------------------|-------|
| 00233091 | 940 | P | M132 | 70 | Z0047 | 39 | 43 | 43 | TND000614321 | | Depleted dry alkaline batteries from plant use. Non-haz | 47 | P |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |
| | | | M | 70 | | 71 | 76 | 76 | | | | 117 | |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Signature of Preparer
Date
1-15-98
1-12-98

TELEPHONE: (512) 239-6832

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions }

Your
EPA ID #

T, X, 1, 2, 0, 0, 9, 3, 9, 6, 2, 1

SUMMARY STATUS

☒ ORIGINAL SUMMARY

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 0024309H | 31 | 35 | 39 | 43 | 57 | 56 | M | 70 | 71 | 76 | 88 | Depleted mercury containing batteries from plant use. H | 47 | 56 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|--|--------------------------|-------|
| 0025309H | 31 | 35 | 39 | 43 | 57 | 56 | M | 70 | 71 | 76 | 88 | Depleted nickel-cadmium batteries from plant use. Hazard | 47 | 56 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |
| | 57 | 67 | 70 | 76 | 57 | 56 | M | 70 | 71 | 76 | 88 | | | 117 |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney
Signature of Preparer

1-15-98

Date

1-22-98

Date

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

Your
EPA ID #

T X 1 1 2 0 0 9 3 9 6 2 1

TELEPHONE: (512) 239-6832

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 0026309H | 31 | 35 | 39 | 43 | 57 | 68 | M | 70 | 71 | 78 | 88 | Depleted and drained lead acid batteries from plant use | 47 | 56 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|------------------|-------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 0027309H | 31 | 35 | 39 | 43 | 57 | 68 | M | 70 | 71 | 78 | 88 | Spill cleanup from sulfuric acid spills from battery ch | 47 | 58 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |
| | 57 | 67 | 70 | 71 | 57 | 68 | M | 70 | 71 | 78 | 88 | | | 117 |

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Colleen McKinney

Preparer, (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Signature of Preparer
1-15-98
Date

1-11-98
Date

TELEPHONE: (512) 239-6832

Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ 22

NO REPORT REQUIRED

{See 30 TAC 335.9(a)(3); also see instructions}

Your
EPA ID #

T X 1 2 0 0 9 3 9 6 1 2

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|---|----------|------------------|-------|--------------------------|-------|
| 00283101 | 31 | 35 | 39 | 43 | M | 70 | 71 | | Spent resin from plant equipment. Non-hazardous. 1992 | | 57 | 66 | 47 | 56 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|---|----------|------------------|-------|--------------------------|-------|
| 00292961 | 31 | 35 | 39 | 43 | M | 70 | 71 | | Replacement of ethylene glycol based antifreeze in proc | | 57 | 66 | 47 | 56 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |
| | | | | | | | | | | | 57 | 66 | | 117 |

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D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney

Signature of Preparer

1-15-98

Date

1-21-98

ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

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Report for: 19 97

FOR DATA YEAR: 1997

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EPA ID #

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Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

SUMMARY STATUS

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|---------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|---|----------|------------------|-------|--------------------------|-------|
| 0030307H | 31 | 35 | 39 | M | 70 | 71 | | Anodes from electroplating bath lead/antimony waste sol | | | 56 | | 56 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |

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|---------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|---|----------|------------------|-------|--------------------------|-------|
| 0031310H | 31 | 35 | 39 | D | 70 | 71 | | Spent adsorbents - socks, solids, rags, debris from pro | | | 58 | | 58 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |
| | 57 | 67 | 71 | M | 70 | 71 | | | | | 117 | | 117 |

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D. Leon Griffin

Authorized Agent (PRINT NAME)

Signature of Preparer

Signature of Authorized Agent

1-15-98

Date

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ANNUAL WASTE SUMMARY

Your SOLID WASTE
REGISTRATION NUMBER:

38907

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Report for: 19 97

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Leon Griffin

Department of the Treasury

9000 Blue Mound Road

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SUMMARY STATUS

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|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 23 | -00323081 | 31 | 35 | 39 | | | | | | RCRA empty steel/plastic containers for disposal. | 47 | 56 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------|-----|--------------------|---------------------|----------|---|--------------------------|-------|
| 23 | -0033404H | 31 | 35 | 39 | | | | | | Waste spent carbon from liquid effluent polishing opera | 47 | 58 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |
| 57 | | 66 | 67 | 71 | M | 70 | | | | | | 117 |

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney

Signature of Preparer

1-15-98

Date

1-21-98

Page 15 of 19

WASTE EVALUATION SECTION
MC 123
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087
TELEPHONE: (512) 239-6832

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT.
TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RC-451.

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | WASTE DESCRIPTION | COMMENTS | QUANTITY HANDLED | UNITS | TOTAL QUANTITY GENERATED | UNITS |
|------------------|-------------------------|-------------------------|-------------------------|------------------|-----|-----------------|---------------------|--|----------|------------------|-------|--------------------------|-------|
| 0034001H | 31 | 35 | 39 | M | 70 | 71 | | discarded commercial chemical containing 1-1-1 trichloro | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |

| TEXAS WASTE CODE | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | RECEIVER'S EPA ID # | WASTE DESCRIPTION | COMMENTS | QUANTITY HANDLED | UNITS | TOTAL QUANTITY GENERATED | UNITS |
|------------------|-------------------------|-------------------------|-------------------------|------------------|-----|-----------------|---------------------|---|----------|------------------|-------|--------------------------|-------|
| 0037388H | 31 | 35 | 39 | D | 70 | 71 | | Waste crushed fluorescent bulbs - mercury containing de | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |
| | 57 | 67 | 71 | | | | | | | | | | |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney
Signature of Preparer
D. Leon Griffin
Signature of Authorized Agent

1-15-98

Date

Page 16 of 19

ANNUAL WASTE SUMMARY

MC 129
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087

TELEPHONE: (512) 238-6632

Leon Griffin
Department of the Treasury
9000 Blue Mound Road
Fort Worth, TX 76131-3304 817-847-3887

FOR DATA YEAR: 1997

Your SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 1997

Your
EPA ID #

T X 1 1 2 0 0 9 3 9 6 2 1

☐ NO REPORT REQUIRED
(See 30 TAC 335.9(a)(3); also see instructions)

SUMMARY STATUS

☐ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-15L

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | WASTE DESCRIPTION | RECEIVER'S EPA ID # | COMMENTS | TOTAL QUANTITY GENERATED | UNITS |
|------------------|------------------|-------|------------------|-----|-----------------|-------------------------|-------------------------|-------------------------|---|---------------------|----------|--------------------------|-------|
| 0038103H | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | 10% Sulfuric acid cleanout of electroplating vent scrub | | | 47 | 56 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | WASTE DESCRIPTION | RECEIVER'S EPA ID # | COMMENTS | TOTAL QUANTITY GENERATED | UNITS |
|------------------|------------------|-------|------------------|-----|-----------------|-------------------------|-------------------------|-------------------------|-------------------------------------|---------------------|----------|--------------------------|-------|
| 0039307H | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | Lead, solid lead waste, lead solder | | | 47 | 56 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |
| | 57 | 66 | M | 70 | 71 | 39 | 43 | 43 | | | | | 117 |

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Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME)

Colleen McKinney
Signature of Preparer

D. Leon Griffin
Signature of Authorized Agent

1-15-98

Date

1-11-98

Date

Page 17 of 19

ANNUAL WASTE SUMMARY

YOUR SOLID WASTE
REGISTRATION NUMBER:

38907

G1

Report for: 19 97

FOR DATA YEAR: 1997

☐ NO REPORT REQUIRED
{See 30 TAC 335.9(a)(3); also see instructions}

Your
EPA ID #

T, X, 1, 2, 0, 0, 9, 3, 9, 6, 2, 1

Leon Griffin

Department of the Treasury

9000 Blue Mound Road

Fort Worth, TX 76131-3304 817-847-3887

SUMMARY STATUS

☒ ORIGINAL SUMMARY

☐ REVISED SUMMARY

SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT.
TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|------------------|-------|---------------------|-----|--------------------|----------------------------|----------------------------|---------------------|------------------------|---|--------------------------|-------|
| 00403191 | 3379300 | P | M132 | 70 | 20040 | 38 | 43 | | OKLAHOMA CITY LANDFILL | Waste sludge from coagulation and flocculation of press | 3391540 | P |
| | 12240 | P | M141 | 70 | 003 | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |

| TEXAS WASTE CODE | QUANTITY HANDLED | UNITS | SYSTEM TYPE CODE | FEE | FACILITY NUMBER | EPA HAZARDOUS WASTE NO. | EPA HAZARDOUS WASTE NO. | RECEIVER'S EPA ID # | COMMENTS | WASTE DESCRIPTION | TOTAL QUANTITY GENERATED | UNITS |
|---------------------|------------------|-------|---------------------|-----|--------------------|----------------------------|----------------------------|---------------------|------------------------|--|--------------------------|-------|
| 00414091 | 202319 | P | M132 | 70 | 20040 | 39 | 43 | | OKLAHOMA CITY LANDFILL | Waste magallo ink from printing presses producing U.S. | 2043000 | P |
| | 1981 | P | M141 | 70 | 001 | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |
| | | | | 70 | | 76 | 76 | | | | | |

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Date

1-11-98

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